

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS, HOUSTON DIVISION**

MARANDA LYNN O'DONNELL, et al.)	
)	
Plaintiffs,)	
)	
v.)	Case No. 16-cv-01414
)	(Consolidated Class Action)
HARRIS COUNTY, TEXAS, et al.)	The Honorable Lee H. Rosenthal
)	U.S. District Judge
Defendants.)	
)	
)	
_____)	

**JOINT NOTICE OF TWO NON-SUBSTANTIVE
CORRECTIONS TO CONSENT DECREE**

The Parties jointly file this Notice of Filing of a Corrected Consent Decree, which is intended to remedy two non-substantive errors in the Consent Decree filed with this Court on September 27, 2019. The errors are in Sections 105 and 110.

1. Section 105 currently states: “The Monitor may hire, employ, or contract with such additional **misdemeanor arrestees** or entities as are reasonably necessary to perform tasks assigned to the Monitor by this Consent Decree. Any **misdemeanor arrestee** hired or otherwise retained by the Monitor will be subject to the provisions of this Consent Decree.” The first instance of the phrase “misdemeanor arrestee” should refer to “persons,” and the second instance should refer to “person or entity.” When corrected, Section 105 will state: “The Monitor may hire, employ, or contract with such additional **persons** or entities as are reasonably necessary to perform tasks assigned to the Monitor by this Consent Decree. Any **person or entity** hired or otherwise retained by the Monitor will be subject to the provisions of this Consent Decree.”

2. Section 110 currently states: “Good cause is shown if **the County** has not been substantially in compliance with this Consent Decree in the two years immediately prior to the end

of the final scheduled year.” Instead of “the County,” the provision should refer to “any Defendant.” When corrected, Section 110 will state: “Good cause is shown if any Defendant has not been substantially in compliance with this Consent Decree in the two years immediately prior to the end of the final scheduled year.”

Exhibit 1 to this Notice is a redlined version of the Consent Decree which reflects the edits described above and the edits the Parties previously made following the Court’s Order granting preliminary approval of the Consent Decree and Settlement Agreement. Exhibit 2 is a clean version of the Consent Decree. The Parties respectfully request that the Court approve the version of the Consent Decree filed as Exhibit 2 to this Notice.

Date: November 4, 2019

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CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of November 2019, I electronically filed the foregoing with the clerk of the court for the U.S. District Court, Southern District of Texas, using the electronic case filing system of the Court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Elizabeth Rossi

Elizabeth Rossi